

3. Further, this Court has supplemental jurisdiction on the related state law claims pursuant to 28 U.S.C. § 1367.

4. Defendants were served with the state court action on September 22, 2016. This removal is timely pursuant to 28 U.S.C. § 1446(b).

5. To the best of the undersigned's knowledge, no other pleadings or documents, other than the Summons and Complaint attached hereto, have been filed in this matter.

6. As required by 28 U.S.C. § 1446(d), Defendants will give notice of the filing of this notice to the Plaintiff and to the clerk of the Circuit Court for Anne Arundel County, Maryland, where the action is currently pending.

WHEREFORE, Defendant respectfully requests that the above captioned matter currently pending in the Circuit Court for Anne Arundel County, Maryland be removed to this Honorable Court.

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CERTIFICATE OF SERVICE


The undersigned does hereby certify that a true and correct copy of the foregoing was served upon the individual(s) listed below by first class mail, postage prepaid on this 20th day of October, 2016 to:

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